

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NATIONAL A-1 ADVERTISING, INC.	:	
106 S. 7 <sup>th</sup> Street	:	
Philadelphia, PA 19106	:	
Plaintiff,	:	
v.	:	
	:	
JOHN DOE a/k/a RICHARD MCCONNELL,	:	No. 2:11-cv-04230-JCJ
et al,	:	
	:	
Defendants.	:	

**MOTION OF DEFENDANTS, ONLINENIC, INC. AND REX W. LIU, TO DISMISS  
PURSUANT TO RULES 12(b)(6) AND 9(b) OF THE  
FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Federal Rules of Civil Procedure 12(b)(6) and 9(b), Defendants OnlineNIC, Inc. and Rex W. Liu hereby move this Honorable Court for an Order, in the form proposed, dismissing Plaintiff's Complaint and any and all claims asserted therein with prejudice (the "Motion"). In support of such Motion, Defendants OnlineNIC, Inc. and Rex W. Liu rely upon the accompanying Memorandum of Law, which is incorporated herein by reference.

Respectfully submitted,

DEEB PETRAKIS BLUM & MURPHY, P.C.

Dated:

By: /s/ Adam S. Barrist  
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Attorneys for Defendants,  
OnlineNIC, Inc. and Rex W. Liu